

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

*Plaintiff,*

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

*Defendant.*

C.A. No. 17-mc-00151-LPS

**RED TREE INVESTMENTS, LLC'S MOTION TO INTERVENE  
AND TO MODIFY THE SALE PROCEDURES ORDER**

Red Tree Investments, LLC (“Red Tree”), through its undersigned counsel, moves for an order (a) permitting Red Tree to intervene in this action pursuant to Federal Rule of Civil Procedure 24; and (b) modifying the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Masters Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker By Special Master and (D) Regarding Related Matters* (“Sale Procedures Order”) entered by the Court on October 7, 2022, D.I. 481, to add Red Tree as a “Sale Process Party.”

The grounds for this motion are more fully set forth in the accompanying opening brief and the Declaration of Justin M. Ellis executed on November 4, 2022.

Dated: November 4, 2022

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